

REMARKS

Claims 1-4, 11-13 and 21-27 are pending in the application. Claims 5-10 and 14-20 have been canceled, and claims 1-4, 11-13 and 21-27 have been amended. Reconsideration of the rejection and allowance of the pending application in view of the following remarks are respectfully requested.

As an initial matter, Applicants would like to thank the Examiner for acknowledging Applicants' claim for foreign priority and receipt of the certified copies of both priority documents. Applicants also thank the Examiner for considering all of the documents cited in the Information Disclosure Statements filed on August 28, 2001, April 11, 2003, June 27, 2003, and November 23, 2004.

In the Office Action, the Examiner rejected claims 1, 2 and 4 under 35 U.S.C. §103(a) as being unpatentable over Ubillos (U.S. Patent No. 5,999,173) in view of "Adobe Premiere 5.0 Classroom in a Book", hereinafter referred to simply as "Adobe". Applicants respectfully traverse the rejection for at least the following reasons.

The present invention converts structure description data for managing media content, such as sound and video, into representation description data that is more suitable for representation. Generally speaking, structure description data may be used to manage media content only in a hierarchical manner, and does not describe how the media content is to be synchronized or represented. In other words, structure description data does not describe the order of representing media content, making it difficult to convert structure description data into representation description data.

The present invention extracts time information of segments of individual segments that use the corresponding media content, arranges the media content in the order of the time information, and arranges the media content in the order of representation. Thus, the present invention provides for conversion of structure description data into representation description data.

Additionally, when the time information is continuous over a plurality of segments of the same media content, the present invention connects the time information and organizes the type of the media corresponding to the time information and addresses indicating the locations of the media.

Thus, when a plurality of individually managed segments are continuous, these segments can be described in an organized way in structural description data. As a result, the present invention utilizes optimal representation description data, and acquires the media content corresponding to the segments to be represented continuously together. Consequently, when continuous segments of the same media content are represented, the present invention avoids having to re-access the media content at the beginning of each continuous segment.

Ubillos discloses a method for manually editing a video program. However, Ubillos does not disclose or suggest converting structure description data into representation description data. The present invention relates to a system for automatic media conversion, whereas Ubillos is directed to manually editing media. Thus, the claimed invention and Ubillos relate to different technologies and have, consequently, different objectives.

According to the present invention, structure description data is provided for automatically converting media that is manually extracted. Taking web page media as an example, the structure description data of the present invention is an audio-video version of the mechanism for making web pages dynamically, such as DHTML and PHP.

Ubillos includes a configuration for managing clips, but this is for manually changing the sequence of the clips using a GUI for editing media. Taking web page media as an example again, Ubillos is an audio-video version of an HTML editor.

Furthermore, according to one aspect of the present invention, summarized media can include alternative data, such as thumbnails. However, Ubillos discloses only that a thumbnail may be a symbol for editing actual data, and the media being edited does not include the thumbnail.

In addition, Applicants submit that display timing and synchronization are generated automatically by the present invention, whereas Ubillos only discloses establishing synchronization by manually operating a symbol of an operation system and soft link with actual data.

One aspect of the present invention is directed to a data processing apparatus which includes an analyzer that receives structure description data as an input. The structure description data describes media content, types of media included in the media content, addresses indicating location of the media content, and segments that use the media. The analyzer extracts the time information of the segments from the structure description data. The data

processing apparatus also includes a converter that automatically organizes the types of media and the addresses per extracted time information, and automatically arranges the type of media and addresses in an order of representation.

Applicants submit that Ubillos and Adobe are both directed to a method and apparatus for performing manual editing operations on video, still image and audio clips. Applicants respectfully submit that Ubillos and Adobe fail to disclose or suggest, either individually or in combination, an analyzer that extracts time information of segments of media content from structure description data, and a converter that automatically organizes types of media and addresses per extracted time information, and automatically arranges the types of media content and addresses in an order of representation, as recited in amended claim 1.

For at least these reasons, Applicants respectfully submit that the rejection of claim 1 is improper, and respectfully request withdrawal thereof.

Dependent claims 2-4, 21 and 22 are also submitted to be in condition for allowance for at least the reasons set forth above with respect to claim 1.

In the Office Action, the Examiner also rejected claims 3-5, 6-9 and 11-13 under 35 U.S.C. §103(a) as being unpatentable over Ubillos in view of Adobe, and further in view of the SMIL 1.0 Specification. Applicants respectfully traverse the rejection for at least the following reasons.

The SMIL Specification describes a language for integrating a set of independent multimedia objects into a synchronized multimedia presentation.

Applicants respectfully submit that the SMIL Specification fails to disclose or suggest an analyzer that extracts time information of segments of media content from structure description data, and a converter that automatically organizes types of media and addresses per extracted time information, and automatically arranges the types of media and addresses in an order of representation. Thus Applicants respectfully submit that the combination of Ubillos, Adobe and the SMIL Specification fails to disclose or suggest an analyzer that extracts time information of segments of media content from structure description data, and a converter that automatically organizes types of media and addresses per extracted time information, and automatically arranges the types of media and addresses in an order of representation, as recited in amended independent claim 1.

Thus, dependent claims 3 and 4 are also submitted to be in condition for allowance for at least the reasons set forth above with respect to claim 1.

Another aspect of the present invention is a data processing apparatus that includes a selector that receives as inputs structure description data and a selection condition. The structure description data may include at least one media content score. The selector selects at least part of the media content based on the selection condition and the at least one media content score. The data processing apparatus also includes a converter that automatically organizes the types of media of the selected media content, and a representer that receives the representation description data and the selected media content, and

represents the selected media content according to the representation description data.

Applicants respectfully submit that Ubillos and Adobe fail to disclose structure description data which describe at least one media content score. The SMIL Specification describes, on pages 28 and 29, a file format which identifies the bitrate of content, the language of content, screen parameters of content, and captions of content. However, Applicants submit that there is no suggestion in either Ubillos or Adobe of a selector that receives a file having this file format.

Thus, Applicants respectfully submit that the combination of Ubillos, Adobe and the SMIL Specification does not disclose or suggest a selector that receives as inputs structure description data which describes at least one media content score, and selects media content based on a selection condition and the at least one media content score, as recited in amended claim 11. Applicants also submit that the combination of Ubillos, Adobe and the SMIL Specification fails to disclose a converter that automatically organizes types of media of the selected media content and addresses per extracted time information, and automatically arranges the types of media and addresses in an order of representation, as recited in claim 11.

For at least these reasons, Applicants respectfully submit that the rejection of claim 11 is improper, and respectfully request withdrawal thereof.

Dependent claims 12, 13 and 23-27 are also submitted to be in condition for allowance for at least the reasons set forth above with respect to claim 11.

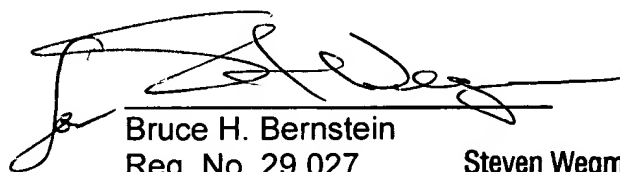
Based on the above, it is respectfully submitted that this application is now in condition for allowance, and a Notice of Allowance is respectfully requested.

SUMMARY AND CONCLUSION

Entry and consideration of the present amendment, reconsideration of the outstanding Office Action, and allowance of the present application and all of the claims therein are respectfully requested and now believed to be appropriate. Applicants have made a sincere effort to place the present invention in condition for allowance and believe that they have now done so.

Should the Examiner have any questions or comments regarding this response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully Submitted,  
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A handwritten signature in black ink, appearing to read 'Bruce H. Bernstein', is written over a horizontal line.

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